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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

TINA NGUYEN CRUZ, *on behalf of herself
and others similarly situated,*

Plaintiff,

v.

KATE SPADE & COMPANY, LLC,

Defendant.

Case No. 2:19-cv-00952-APG-BNW

**JOINT STIPULATION TO STAY
DISCOVERY FOR SIXTY DAYS OR
UNTIL A RULING ON KATE SPADE'S
MOTION TO DISMISS HAS BEEN
ENTERED, WHICHEVER OCCURS
SOONER (FIRST REQUEST)**

Compl. Filed: June 5, 2019
Trial Date: None Set

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1. Good cause exists to stay the Federal Rule of Civil Procedure 26(f) conference of counsel and all subsequent discovery for sixty (60) days or until a ruling on Kate Spade's Motion to Dismiss and to Strike ("Motion to Dismiss") has been entered, whichever occurs sooner.

3. Kate Spade filed its Motion to Dismiss on September 16, 2019 (Dkt. No. 11), Plaintiff filed her Opposition on September 30, 2019 (Dkt. No. 14), and Kate Spade filed its Reply in support of its Motion to Dismiss on October 7, 2019 (Dkt. No. 17).

5. Accordingly, the parties jointly request that the Court stay the Federal Rule of Civil Procedure Rule 26(f) conference of counsel and all subsequent discovery for sixty (60) days or until a ruling on Kate Spade's Motion to Dismiss has been entered, whichever occurs sooner.

6. The parties will meet and confer regarding the propriety of extending the stay or another resolution at least ten (10) business days prior to the expiration of the proposed stay if the Court has not yet ruled on Kate Spade's Motion to Dismiss.

7. This request is made in good faith and the proposed stay will not cause prejudice to either party. This is the parties' first request to stay discovery.

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8. The parties reserve all rights regarding the propriety, scope, and timing of discovery upon expiration of this proposed stay.

IT IS SO STIPULATED AND REQUESTED, THROUGH THE BELOW COUNSEL OF RECORD:

Dated: December 20, 2019

Dated December 20, 2019

/s/ Walter R. Cannon

OLSON, CANNON, GORMLEY, ANGULO & STROBERSKI

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Las Vegas, Nevada 89129

/s/ Miles N. Clark

KNEPPER & CLARK LLC

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By: _____
Attorneys for Tapestry, Inc.

By: _____
Attorneys for Tina Nguyen Cruz

Dated: December 19, 2019

Dated December 19, 2019

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IT IS SO ORDERED

DATED: 12/23/19



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

By: _____
Attorneys for Tina Nguyen Cruz

IT IS HEREBY ORDERED that ECF No. 28 is **GRANTED**. **IT IS FURTHER ORDERED** that the parties must file a joint status report by **2/24/2020** stating whether they believe discovery should continue to be stayed or move forward. If the latter, the parties must also submit a proposed joint discovery plan and scheduling order by **2/24/2020**.